

EXHIBIT A

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BEIJING BRUSSELS LONDON LOS ANGELES
NEW YORK SAN FRANCISCO SEOUL
SHANGHAI SILICON VALLEY WASHINGTON

Robert K. Kelner

Covington & Burling LLP
One CityCenter
850 Tenth Street, NW
Washington, DC 20001-4956
T +1 202 662 5503
rkelner@cov.com

January 11, 2017

Ms. Heather H. Hunt
Registration Unit
U.S. Department of Justice
600 E Street, N.W.
Washington, D.C. 20004

Re: Flynn Intel Group, Inc.

Dear Ms. Hunt:

On behalf of our clients, Lieutenant General Michael T. Flynn and the Flynn Intel Group, Inc. ("FIG"), this letter provides an initial response to your November 30, 2016, letter to General Flynn and FIG regarding a potential obligation to register under the Foreign Agents Registration Act ("FARA"). As a preliminary matter, we appreciate the several telephone conversations that you and I have had over the last several days concerning our review of this matter and the steps we are taking to respond to your inquiry letter.

As I noted in our initial conversation, the existence of your letter was not known to General Flynn and FIG until approximately December 24, 2016, because FIG generally suspended its activities in mid-November, including the use of the office to which the letter was sent. As soon as the letter was discovered, FIG contacted the FARA Registration Unit to discuss a timeline for responding. Since that time, we have been working diligently to gather and review information necessary to understand the activities relevant to your letter, and we intend to respond more fully as soon as we are capable of doing so.

As I shared in our recent telephone conversation, based on currently available information, we anticipate that General Flynn and FIG likely will file a FARA registration statement and supplemental statement for FIG's representation of Inovo BV, in lieu of the Lobbying Disclosure Act ("LDA") filing that FIG filed on September 30, 2016. Although the LDA filing disclosed FIG's engagement by Inovo BV, in hindsight it seems likely that the subject matter of FIG's representation of Inovo BV may have called for registration under FARA rather than under the LDA.

As discussed with you, our review has been complicated by a number of factors, including challenges in recovering e-mails and other documents because FIG began shutting down in mid-November, prior to your letter. In addition, as I shared with you, we have not yet reached a final determination as to the foreign principal(s) to be listed in a FARA registration. We are also continuing to assess the role of various consultants and employees who performed work for Inovo BV in order to determine whether any of them are required to file short-form FARA registrations.

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Your letter asked several questions regarding an op-ed authored by General Flynn and published in *The Hill* newspaper on November 8, 2016. It is our current understanding that the op-ed was initiated by General Flynn himself, and that he intended the op-ed to summarize a number of his longstanding public statements and positions regarding issues related to Turkey, Syria, and the Islamic State in Iraq and Syria. We also believe that the op-ed may have been prepared in the context of FIG's representation of Inovo BV, as the draft op-ed was shared with a representative of Inovo BV prior to publication and the op-ed related to subject matters overlapping with FIG's representation of Inovo BV. Again, our efforts to understand the relevant facts are ongoing, and we will continue to keep you and the Department apprised as our efforts continue.

As we have discussed, the FARA registration that FIG and General Flynn likely will file would include various details required to be disclosed under FARA, including information responsive to other questions posed in your inquiry letter. We are moving as quickly as reasonably possible to assemble the necessary information, and we will continue to remain in close touch with the FARA Registration Unit.

As always, please contact me if you have any questions about this matter.

Respectfully submitted,



Robert K. Keiner

cc: Clifford Rones